

EXHIBIT A

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re:

PG&E CORPORATION

- and -

PACIFIC GAS AND ELECTRIC
COMPANY,

Debtors.

Bankruptcy Case
No. 19-30088 (DM)

Chapter 11
(Lead Case)
(Jointly Administered)

**DECLARATION OF MATT ARCHER
REGARDING WILLIAM B. ABRAMS
MOTION TO DESIGNATE
IMPROPERLY SOLICITED VOTES
PURSUANT TO 11 U.S.C. §1125(B) AND
1126(E) AND BANKRUPTCY RULE 2019**

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the Lead Case,
No. 19-30088 (DM).*

Date: May 12, 2020
Time: 10:00 a.m. (Pacific Time)
Place: United States Bankruptcy Court
Courtroom 17, 16th Floor
450 Golden Gate Avenue
San Francisco, CA 94102

Re: Docket No. 6799, 6964, 6963

DECLARATION OF MATT ARCHER

Matt Archer declares the following pursuant to 28 U.S.C. § 1746:

1. I am the head of the Mass Torts IT Department of WATTS GUERRA, with primary responsibility over the database management and digital communications with its California Fires client base.

2. I designed the text and email communications to our clients concerning the voting process, and the ballot dissemination to our clients in such digital media. These designs and communications were each approved by attorneys at WATTS GUERRA before being disseminated to its clients. Importantly, only WATTS GUERRA clients who timely filed Notices of Claims prior to the Court's Amended Bar Date of December 31, 2019, received ballots from WATTS GUERRA during the March 31, 2020 to May 15, 2020 voting period with respect to the Amended Plan.

1 3. Our clients can be categorized into three categories: (1) those who provided us with
2 a cell phone number, to whom we could text; (2) those who did not provide us a cell phone number,
3 but did provide us with an email address, to whom we could email; and (3) those who provided us
4 with neither a cell phone number, nor an email address, to whom we could communicate only
5 through physical mail.
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7 a. As to those WATTS GUERRA clients in category #1 above - those who
8 provided us with a cell phone number, to whom we could text – I prepared a text
9 communication to permit those individuals to vote via ballot sent by text. A
10 template of that ballot is attached hereto:
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Camp Fire Settlement



PG&E Fire Settlement

5/8/2020, 2:22 PM

RE:222222-Archer, Matthew

Hello Matt. The time has come to confirm PG&E's Bankruptcy Exit Plan. **As your legal counsel, we strongly encourage you to support the Plan and vote to "Accept".** The decision, however, is yours to make. Please review the Disclosure Statement and then cast your ballot.

Vote Now.

[Review Court Ordered Documents >](#)

☒ [ACCEPT \(I.E., VOTE IN FAVOR\) the Plan >](#)

☐ [REJECT \(I.E., VOTE AGAINST\) the Plan >](#)

Review Court Ordered Documents

1. Disclosure Statement - Debtors' and Shareholder Proponents' Joint Chapter 11 Plan of Reorganization dated January 31, 2020

[Click Here to Review the Disclosure Statement](#)

2. Judge Montali Order dated March 17, 2020 Approving the Proposed Disclosure Statement; Plan Solicitation and Voting Procedures; Forms of Ballots, Solicitation Packages and Related Notices

[Click Here to Review the Order](#)

3. Confirmation Hearing Notice notifying all parties of the May 27, 2020 @ 10:00 a.m. hearing to confirm the Plan

[Click Here to Review the Confirmation Hearing Notice](#)

4. PGE Fire Settlement Ballot

[Click Here to Review the Fire Victim Ballot](#)



ACCEPT (I.E., VOTE IN FAVOR) the Plan



REJECT (I.E., VOTE AGAINST) the Plan



- b. As to those WATTS GUERRA clients in category #2 above - those who did not provide us with a cell phone number, but did provide us with an email address – I prepared a communication to permit those individuals to vote via ballot sent by email, where they could respond via email by either typing “ACCEPT” or by instead by communicating their decision to “REJECT” the Amended Plan.

1 c. As to those WATTS GUERRA clients in category #3 above - those who did not
2 provide us with a cell phone number, nor with an email address – I prepared a
3 communication to permit those individuals to vote via ballot sent by mail, where
4 they could respond by either selecting either “ACCEPT” to communicate their
5 acceptance the Amended Plan, or “REJECT to communicate their rejection of
6 the Amended Plan.
7

8 4. These votes are each collected and tallied by me. There is a digital record of each
9 “text” vote received, and whether the vote cast was to “ACCEPT” or to “REJECT” the Amended
10 Plan. Likewise, I have a digital record of each “email” vote received, and whether the vote cast
11 was to “ACCEPT” or to “REJECT” the Amended Plan. Finally, as to paper ballots cast, I maintain
12 a PDF record of each paper ballot mailed back or otherwise received by WATTS GUERRA. Thus,
13 WATTS GUERRA has a record of each vote received from its clients. I pledge to maintain the
14 records of each vote received by WATTS GUERRA – regardless of mode – so that the Court or
15 any third-party it assigns, may review our records to audit the vote totals submitted by WATTS
16 GUERRA to Prime Clerk on May 15, 2020.
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18 5. As of today, WATTS GUERRA has received clear indication from its clients as
19 follows:
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- 21 a. 13,473 “ACCEPT” votes; and
22 b. 108 “REJECT” votes.

23 I have carefully eliminated any duplicate votes cast by a limited number of WATTS GUERRA to
24 ensure that only one vote for each client is submitted to Prime Clerk.

25 6. There have been no instances of WATTS GUERRA changing a client’s vote without
26 documented consent and a documented request to do so. There have only been 56 votes changed
27 and only at the client’s request in writing.
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1 7. As to 71 WATTS GUERRA clients, we have received conflicting votes of both
2 “ACCEPT” and “REJECT,” and therefore, we have sent out the following message advising such
3 clients of such, and asking for their final vote as follows:
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Camp Fire Settlement



PG&E Fire Settlement

5/8/2020, 11:52 AM

RE: 222222-Archer, Matthew

Dear Matt,

We have been attempting to contact you, and may have already spoken to you about the following:

Our records indicate you have cast conflicting votes. Please take time to review the materials again and cast your final vote.

Which way you vote is your choice. We simply need you to clearly pick with "Accept," or "Reject," below.

Review Court Ordered Documents



ACCEPT (I.E., VOTE IN FAVOR) the Plan



REJECT (I.E., VOTE AGAINST) the Plan



Email your questions



Call with questions



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2 As to these clients, WATTS GUERRA will not cast their vote with Prime Clerk unless we receive
3 a final vote for the particular client.

4 8. In addition, only as to those clients who have voted to “ACCEPT,” WATTS
5 GUERRA has sent our clients the following message, giving them the right to change their votes:
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Camp Fire Settlement



PG&E Fire Settlement

5/7/2020, 3:13 PM

RE: 222222-Archer, Matthew

Hello Matt.

As the deadline for voting on the proposed \$13.5 billion settlement approaches, we are messaging our clients who have registered their vote with us to confirm that we have your response accurately recorded.

If you are receiving this message, we have received your vote to **ACCEPT** the settlement agreement. You have voted to ACCEPT for the following claim:

222222-Archer, Matthew

If this information is not correct and you would like to instead vote to REJECT the settlement, please call or email us immediately using the buttons below.

Thank you for making your voice heard and participating in this important vote. We will submit your vote to the court on your behalf.

Call with questions



Email your questions



1 If between now and the voting deadline, a WATTS GUERRA client indicates in writing a desire to
2 change their vote from "ACCEPT" to "REJECT," their revised ballot will be provided to Prime
3 Clerk as a vote cast to "REJECT" the Amended Plan.

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5 9. By contrast, WATTS GUERRA did not ask any of our 108 clients voting to
6 "REJECT" the plan if they wanted to change their vote. Rather, WATTS GUERRA has notified
7 each of its clients who it shows as having voted to "REJECT" an additional text informing them
8 merely that the firm shows them as having voted to "REJECT."

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10 10. WATTS GUERRA has a list of the identity and the corresponding Notice of Claim
11 number at Prime Clerk. The vote tallies to be sent to Prime Clerk will specifically list each
12 individual, their corresponding Notice of Claim number, and the vote to either "ACCEPT" or
13 "REJECT" sent to WATTS GUERRA. WATTS GUERRA will maintain the digital record of every
14 vote collected, and will provide the same to this Court, or any auditing agent selected by it to verify
15 the vote. On or before May 15, 2020, I will submit WATTS GUERRA's clients' final vote totals
16 to Prime Clerk pursuant to the election they made under Orders of this Court.

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18 11. I texted and emailed the court-ordered disclosure statement and other-court-ordered
19 documents to WATTS GUERRA clients together with their ballots beginning on March 31, 2020,
20 and not before. I am also aware that WATTS GUERRA transmitted to its clients on the date paper
21 copies of the court-ordered disclosure statement and other-court-ordered documents to WATTS
22 GUERRA clients, together with paper ballots on that date as well.

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24 12. I have personal knowledge of the matters in this declaration, and I affirm that the
25 facts set forth in this declaration are true and correct.

26
27 Dated May 8, 2020

28
/s/ Matt Archer
Matt Archer